

18 A. Again, from a business process perspective, yes.
19 And I am also aware that they forecasted what they were
20 going to need in terms of staffing, and began the process
21 of bringing on the additional people that LISC was going
22 to need to process this large volume of requests.

23 But I was not directly involved with the process
24 of putting together the plan that says, this is how we are
25 going to bring people in, et cetera. You know, I was
0042
1 involved with the development of business processes to
2 support the LISC, and so within that, anything that is
3 volume sensitive would be something that I would -- that I
4 would address.

5 Q. Well, and in trying to determine the LISC's
6 ability to handle certain volume of orders, you needed to
7 know what the processes and systems were in order to
8 figure out, for example, how many orders can one person
9 process in a given day; is that an analysis that you
10 undertook at any point?

11 A. Yes.

12 Q. And when did you do that?

13 A. We did that -- that process actually began in
14 probably mid-year 1995.

15 Q. And any individual's productivity is going to be
16 a function of the processes that they use and the systems
17 that are in place, right?

18 A. Correct.

19 Q. And then it's just a function of how many people
20 do you devote to the effort, and that tells you,

21 presumably, your aggregate productivity?

22 A. Right.

23 Q. When you were attempting to plan for the

24 LISC -- strike that.

25 THE WITNESS: Can we take a health break?

0043

1 MR. McDONALD: Sure.

2 (Recess taken.)

3 MR. McDONALD: Q. Let's see. I think you have

4 already talked about the receipt and response stage, I

5 guess I'd like to move on to the provisioning stage.

6 In terms of CLC complaints that you became aware

7 of -- maybe the way I should start is, have you already

8 described to us the problems that were identified by CLC's

9 with respect to the receipt and response stage of the

10 order process?

11 A. Yes.

12 Q. In the provision stage that you described, are

13 you aware of problems that were identified by CLC's?

14 A. Yes.

15 Q. And what were those?

16 A. Some of the problems included loss of dial tone,

17 loss of features, and provisioning intervals.

18 Q. And the loss of dial tone is exactly what it

19 says, some end users lost dial tone upon processing a

20 resale order?

21 A. Correct.

22 Q. And loss of features, can you describe what that

23 is?

24 A. That is where an end-user customer is migrating

25 from Pacific Bell, as their local service provider, to a
0044

1 competitive local carrier, and within that process, loses

2 certain custom calling features as a result of that

3 migration.

4 Q. And then, can you describe what the provisioning

5 intervals problem was?

6 MR. KOLTO-WININGER: This is all in the context

7 of her understanding of what the CLC's were raising as

8 issues?

9 MR. McDONALD: Q. Right.

10 A. With regards to provisioning intervals, it's

11 largely an issue of parity with the retail business, in

12 terms of the length of time it takes to either migrate an

13 end user from Pacific to another local service provider or

14 the interval associated with the provision of new

15 services.

16 Q. Did you engage in any communications with CLC's

17 about any of these three identified problems?

18 A. Not that I recall.

19 Q. Did other Pacific Bell employees discuss these

20 problems with you?

21 A. Yes.

22 Q. And do you remember who?

23 A. Ann Long, other members of my team, my managers,

24 who deal with the LISC on a day-to-day basis. Some of the

25 folks on the provisioning side of the business, you know,

0045

1 that actually work the orders or their staff counterparts.

2 Q. Were you involved in any effort to try to

3 address these problems?

4 A. Yes.

5 Q. And with the loss of dial tone, what, if

6 anything, did you do?

7 A. We were involved from the perspective, again, of

8 business process, in terms of looking at the business

9 process to determine if there was something within the

10 process that was causing the loss of dial tone.

11 Q. Did you determine that there was one or more

12 elements in the process that contributed to the loss of

13 dial tone?

14 A. Yes.

15 Q. What were those?

16 A. There was a field identifier on the service

17 order called a RUF, R-U-F -- I don't know what it stands

18 for -- and another field called RRSO, and the

19 mis-sequencing of the data that follows those FID's,

20 F-I-D's, or Field Identifications, could cause one of the

21 service orders to fall out, subsequently resulting in a

22 loss of dial tone, if the other service order continues

23 within the process.

24 Q. A Field Identifier, that is an -- essentially, a

25 name given to data that goes in a certain place in an
0046

1 order?

2 A. It's a name given to a field within the order,

3 and generally data follows that field. In the case of
4 these fields, it's largely service order numbers, and
5 sequencing data that follows those FID's.

6 Q. Is this related to -- I described to you some
7 testimony that Ann Long gave that talked about a change
8 order and a disconnect order; one of them could fall out,
9 leading to a loss of dial tone. Is that what you are
10 describing as well?

11 A. Yes.

12 Q. The RUF, that is a field identifier?

13 A. Yes.

14 Q. And likewise, the RRSO is a field identifier?

15 A. Yes.

16 Q. Just to have a better understanding, is that
17 something that appears on the screen, and then following
18 those letters, the service rep or the order writer is
19 supposed to type in a certain sequence of information?

20 A. Correct.

21 Q. And then, if a mistake is made in that entry,
22 that mistake has led to the drop of the dial tone?

23 A. Correct.

24 Q. Are you familiar with the change order and a
25 disconnect order in this resale process?

0047

1 A. Yes.

2 Q. Now, am I correct to understand that what
3 commonly occurs, a service representative is entering
4 information in the SORD, they will prepare both a change
5 order and a disconnect order. The purpose of the

6 disconnect order is to take the end user out of the CRIS
7 billing system, and does the person -- does the end user
8 get moved to CABS through that end order?

9 A. Yes. Not through the disconnect order. They
10 get moved to CABS as a result of the change order.

11 Q. Okay. Now, if -- is that, essentially, what
12 those two orders do, the disconnect takes the end user out
13 of CRIS and the change moves that end user to CABS?

14 A. That's not the only thing that they do.

15 Q. Can you describe, generally, what else they do?

16 A. What they also do is to populate the downstream
17 systems associated with repair and/or maintenance, as well
18 as the automatic referral, call referral unit that's both
19 in 611, the repair bureau, and the retail business office.

20 They also, essentially, change the inventory
21 system to reflect that this is no longer a retail system
22 but it is now a resale system belonging to a CLC. And,
23 again, for purposes of ensuring that if a subsequent call
24 comes in on that service, the provisioning maintenance and
25 business office folks know how to process that call on the
0048

1 basis of the type of service and the type of customer
2 associated with that service.

3 Q. Now, in your investigation of the loss of dial
4 tone, did you determine that the primary source of dial
5 tone loss was these errors with the information, following
6 these field identifications?

7 A. Yes.

8 Q. Were there other causes of the dial tone loss

9 that you are aware of?

10 A. No.

11 Q. And what was the result, if these errors were

12 being made? Was something occurring, like a change order

13 would drop out but the disconnect order would go through

14 the system?

15 A. Essentially, yes, or vice versa.

16 Q. Can you explain what happens if one goes through

17 without the other? Is your familiarity of the system and

18 the processes sufficient enough to give us, at least in a

19 narrative way, an explanation for why dial tone would be

20 lost, say, if the disconnect order got dropped and only

21 the change order flowed through the systems?

22 MR. KOLTO-WININGER: Objection. Calls for a

23 narrative. Go ahead.

24 THE WITNESS: Okay. I am not familiar with the

25 specific details associated with the downstream systems or
0049

1 the provisioning groups, but essentially, it's a matter

2 of, if one falls out and the other goes through, there is

3 an opportunity there where the other order can be worked

4 without -- can be worked within the switch, without the

5 relationship to the one that fell out, and could

6 ultimately result in loss of dial tone.

7 That issue has been fixed within the service

8 order system by removing -- we removed one of the FID's,

9 the RUF, and with the other one, we put some fixes into

10 place, some edit fixes into place, within the service rep

11 work stations to ensure the accuracy of the sequencing.

12 MR. McDONALD: Q. What were those changes in
13 the service rep's functions?

14 A. Essentially, we made some changes to the -- we
15 did some enhancement to the macros that reside on the
16 service rep work stations to assure the accuracy of the
17 sequencing.

18 Q. Is there some system in place now that precludes
19 the C and D orders from being disconnected -- from being
20 separated?

21 A. I don't know if it absolutely -- I honestly
22 don't know if it absolutely precludes them from being
23 separated. That's really at a level of detail that's --

24 Q. Sure. Do you know when this revision -- or
25 these revisions that you've talked about occurred?
0050

1 A. December '96.

2 Q. Do you know when you first learned of the dial
3 tone losses occurring?

4 A. November of '96.

5 Q. Are you aware of any continuing problem of dial
6 tone loss occurring?

7 A. I am aware of reports of dial tone loss, but
8 that's being looked at by another group of folks involved
9 with the provisioning aspect of the overall process.

10 Q. Now, with respect to -- is there any other
11 element of the loss of dial tone that we haven't already
12 talked about, in terms of identifying what the problem was

13 and then trying to implement a correction?

14 A. No.

15 Q. Now, as to loss of features, can you describe
16 what -- what was your involvement with that problem?

17 A. Essentially, we again got reports from customers
18 indicating that there were problems with loss of features
19 resulting from the migration process. We looked at that
20 and determined that there were a combination of things
21 going on, three different things, essentially, going on
22 that could result in loss of features.

23 One is that the request coming from the customer
24 or the Competitive Local Carrier was inaccurate, in the
25 sense that it did not contain the feature that the
0051

1 customer previously had, prior to their migration to the
2 new local service provider. The other was -- could be a
3 LISC service rep error, and the third could be a problem
4 in the switch, in the actual central office switch where
5 the feature is provisioned.

6 Q. Did you have involvement with attempting to fix
7 one or more aspects of that problem?

8 A. That effort is actually ongoing.

9 Q. So I mean, in the process side, have you
10 identified where there appears to be a deficiency?

11 MR. KOLTO-WININGER: Objection. If any. Go
12 ahead.

13 THE WITNESS: Well, we've looked at it from the
14 process perspective and don't see that there is a problem
15 with the basic process. So from that perspective, we have

16 looked at it. It is largely in the hands of our
17 provisioning organization who's looking at the other
18 aspects of feature loss.

19 MR. McDONALD: Q. Was it your sense that it's a
20 result of a system problem?

21 A. No.

22 Q. What do you think the cause of the problem is,
23 if it's not a process problem and it's not a system
24 problem?

25 A. Well, I think that it is a problem with the
0052

1 CLC's, in terms of the requests that we are getting in
2 from them and the inaccuracies on the requests, in terms
3 of features being left off. And there has also been a
4 training issue within the LISC which our training
5 organization has largely addressed, but there has not been
6 an issue relative to the Methods and Procedures for the
7 business process in and of itself.

8 Q. And on the third element of the provisioning
9 stage, the third problem that you identified dealing with
10 provisioning intervals, were you involved in any way with
11 being involved in discussions about those problems?

12 A. Yes.

13 Q. What was your involvement?

14 A. Largely, to look at the provisioning intervals
15 and the business processes associated with how you
16 establish those intervals on any given request, to see
17 what we need to do to shore up the process in such a way

18 that we are in parity with the retail business, and that
19 effort is also ongoing.

20 Q. What have you determined thus far?

21 A. Largely, that the problem appears to be
22 primarily associated with the establishment of new
23 services. It is a problem of the nature of the process
24 when you are dealing with Competitive Local Carriers
25 versus dealing directly with the end-user customer, in
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1 that there are inherent delays when you deal with local
2 services through a third party rather than directly with
3 the end user, in that requests are batched in, they are
4 batched in frequently throughout the day, and then
5 processed. But there is an inherent delay associated with
6 that basic process. So that's the primary thing that we
7 have discovered so far.

8 Q. What you are doing is analyzing in comparison to
9 the provision of those services at Pacific's own end user,
10 and determining that there is a difference that exists for
11 Pacific's end users and CLC's end users?

12 A. For certain activities, yes.

13 Q. Did you say for new service?

14 A. Yes.

15 Q. What, in general, is the difference in the
16 intervals?

17 A. With new service, where there is a Quick Dial
18 Tone, QDT, or a connected facility at the end user's
19 locale, the retail business is able to offer a shorter
20 interval than the LISC because they are on the phone with

21 the end user and making the -- completing the transaction
22 between themselves and the end user at that point in time.

23 And the LISC, because they are getting their
24 requests batched in from the CLC's, again, there is that
25 inherent delay. So the CLC may have talked to the
0054

1 customer, you know, four hours ago or eight hours ago,
2 whereas the LISC is just now getting the request for
3 service. And so that automatically puts you in a
4 disparaged situation in terms of provisioning intervals.

5 Q. But in that investigation where you are looking
6 at that, you are also aware, are you not, that even when
7 the orders come in, they are batched?

8 And then, you think Ann Long's testimony was
9 that they are not even processed by the LISC? I think she
10 said there was a 10-day delay; is that something that you
11 are aware of?

12 MR. KOLTO-WININGER: I am objecting in that she
13 said she didn't read Ann Long's testimony.

14 Can we go off the record?

15 MR. McDONALD: Sure.

16 (Discussion off the record.)

17 MR. McDONALD: Do we have a pending question?

18 MR. KOLTO-WININGER: Please read the question
19 back to the witness. And you give your best answer
20 subject to my objection.

21 (Record read.)

22 MR. KOLTO-WININGER: I will object to lacking

23 foundation and calling for speculation, but go ahead and
24 answer.

25 THE WITNESS: I am not aware of the details
0055

1 relative to the level of the delay, but I am aware that,
2 yeah, that there have been delays associated with the
3 processing of the requests.

4 MR. McDONALD: Q. If you are looking at trying
5 to ensure that there is parity between Pacific's retail
6 end users and CLC end users, don't you need to know what
7 backlog, if any, exists at the LISC?

8 A. Well, again, I am looking at it from a process
9 perspective, knowing that the process, in and of itself,
10 there are delays inherent in the process. So I am looking
11 at it from the perspective of how do I change the process
12 in such a way, either for the retail business or the
13 resale business or both, so that they are brought into
14 parity with one another.

15 Q. Am I correct to understand that, at least thus
16 far, what you've focused on is the fact that for the CLC
17 end user, there is -- I mean, the CLC acts as an
18 intermediary between the end user and Pacific and that
19 intermediary doesn't exist for the Pacific end user; is
20 that right?

21 A. Correct.

22 Q. Is that the focus of your analysis as to where
23 the lack of parity may exist?

24 A. The focus of my analysis is, again, on the two
25 business processes, and trying to shore up those business

0056

1 processes on both sides in such a way that it will result
2 in parity.

3 Q. Well, is there any -- I mean, you say shore up
4 on both sides. To your knowledge, were there any
5 intervals that are shorter for CLC end user customers than
6 there are for Pacific retail end users?

7 A. There are no published intervals that are
8 shorter for CLC's retail customers than for a retail
9 customer. The reality is that, because of differences in
10 process, the result is intervals that are shorter for an
11 end user than they are for a CLC customer, primarily in
12 the area of new service.

13 Q. And when you say end user, I think you are
14 talking about a Pacific retail end user as compared to the
15 CLC end user?

16 A. Correct.

17 Q. Okay. So we are at the provision stage of this
18 five stage process. You have told us about three problems
19 that were identified that you became aware of, and is that
20 the extent of the problems, that you are aware of, with
21 respect to the provision stage?

22 A. Yes.

23 Q. Now, in the completion response stage, are you
24 aware of problems that have been identified by CLC's?

25 A. Yes.

0057

1 Q. And what, if any -- what are those?

2 A. Largely, it's an issue of timeliness, the

3 timeliness of completion back to the CLC's.

4 Q. So have you discussed that with CLC's?

5 A. No.

6 Q. How did you learn of this complaint?

7 A. Through my counterparts in the LISC.

8 Q. Who would that be?

9 A. Ann Long, Don Griffin, the other managers in the
10 LISC.

11 Q. They told you that the CLC's were complaining
12 because they were not receiving timely notification when a
13 migration has occurred?

14 A. Yes.

15 Q. Did they tell you anything else?

16 A. No.

17 Q. What did you do on learning of that problem?

18 A. Looked to see what we could do, again, from a
19 process perspective to tighten up the interval, the
20 completion notification interval. We looked to the LTD
21 system for completion notification for carriers that are
22 on fax and to the Cleo system for carriers who are on the
23 resale mechanized interface, the NDM.

24 Q. Did you implement changes to try to improve the
25 timeliness of the completion notices?

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1 A. We are in the process of implementing changes in
2 LTD to facilitate completion notification, and also in the
3 process of implementing changes within Cleo to further
4 automate the completion response.

5 Q. What are the changes to LTD that you are going

6 to make?

7 A. We have established a fax back system for,
8 again, carriers that are faxing requests in to us that
9 is -- it's got a GUI, G-U-I, interface, Graphical User
10 Interface, that makes it easier for the service reps to
11 get the completion information back to the carriers and,
12 essentially, the same type of thing on the Cleo side.

13 It's more automated on the Cleo side because
14 those carriers are already coming in to us electronically,
15 so it's a more automated process of the system, actually
16 notifying Cleo of completion and then automatically
17 accepting back the completion to the CLC, so there is less
18 human intervention.

19 Q. Now, currently -- tell me if I am correct.
20 Currently, the way I think the system has operated to
21 date, or the process has operated to date -- strike all
22 that.

23 Tell me if I am correct, that the way that the
24 completion notification process has worked to date is that
25 on either the due date or the day after the due date, an
0059
1 individual at the LISC will examine the order package and
2 pull up the order on a -- from the computer screen to
3 determine if the migration has actually occurred and then
4 issue the completion notice?

5 A. Correct.

6 Q. What you are talking about doing is implementing
7 a mechanized system so that a completion notice will be

8 issued when the systems, the computer systems are alerted
9 that the migration has occurred?

10 A. Correct.

11 Q. And has it been implemented on either end for
12 either the faxed orders or the NDM orders?

13 A. Well, for the faxed orders, it will not be an
14 auto notification because those orders are coming in to us
15 manually, and so those will continue to be processed by
16 the LISC service rep in the way that you described, but
17 they will be processed through LTD.

18 For the Cleo orders, essentially, the
19 notification comes from the service order system into the
20 Cleo system, and then there is an auto complete back to
21 the CLC's, and that's in development.

22 Q. Do you know when the expected completion date
23 is, the time of release date, anything like that, to your
24 knowledge?

25 A. I believe it's in the June time frame.
0060

1 MR. KOLTO-WININGER: Off the record for a
2 second.

3 (Discussion off the record.)

4 MR. McDONALD: Back on the record.

5 Q. As to the completion response problems, the one
6 that you identified was the lack of timeliness, and you
7 have already described the two efforts undertaken to try
8 to resolve that problem; is that right?

9 A. Correct.

10 Q. When you say lack of timeliness, it's the

11 timeliness of notifying the CLC after migration has

12 actually occurred; is that right?

13 A. Correct.

14 Q. It's not that the completion response wasn't

15 received within three or four days of the order being

16 submitted?

17 A. No. It's entirely an issue around notification

18 that the migration has been completed.

19 Q. And do you understand why it's significant to

20 CLC's to have that notice?

21 A. Certainly.

22 Q. Can you explain what the reason is?

23 MR. KOLTO-WININGER: What your understanding is.

24 THE WITNESS: My understanding is that, number

25 one, it's the confirmation, if you want to call it that,
0061

1 that the end user is now a customer of that Competitive

2 Local Carrier. And with that go the responsibilities of

3 being a local service provider, as well as it's a matter

4 of notifying the CLC so that they can commence billing

5 that end-user customer, and know that they are going to

6 receive the usage information from Pacific to facilitate

7 that billing.

8 MR. McDONALD: Q. Have you then advised us or

9 testified about any of the problems that you are aware of,

10 in connection with the completion response?

11 A. Could you repeat that?

12 Q. Has your testimony given us the problems that

13 have been identified with the completion response stage of
14 the resale order process?

15 A. Yeah.

16 MR. KOLTO-WININGER: I am going to object that
17 it mischaracterizes the discussion in terms of identifying
18 whether it's a CLC issue or, quote, a problem, or however
19 it was just identified. But go ahead and answer.

20 MR. McDONALD: Q. Are there any other problems
21 dealing with completion response that you are aware of?

22 A. No.

23 Q. Now, on the billing stage, are there problems
24 that have been identified to you or that you are aware of
25 in the billing stage?

0062

1 MR. KOLTO-WININGER: Objection. Vague. But go
2 ahead and answer.

3 THE WITNESS: I do not deal with billing issues
4 for resale services. There is another director in the
5 organization that deals with that.

6 MR. McDONALD: Q. So you are just not aware?

7 A. No.

8 Q. Now, of the issues that we discussed in these
9 five stages, at the receipt stage of, say, early on, there
10 was an interval to determine the status of orders; is that
11 fair?

12 A. Correct.

13 Q. And then, at the response stage, there was delay
14 in FOC's being timely issued; is that correct?

15 A. Yes.

16 Q. And then, in the provisioning stage, there were
17 loss of dial tone, loss of features, and questions about
18 provisioning intervals?

19 A. Correct.

20 Q. And then, on the completion notices, you
21 testified about lack of timeliness, right?

22 A. Correct.

23 Q. So is that the universe of problems that you've
24 been made aware of with respect to the resale order
25 process?

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1 A. I would say so, yes.

2 Q. Now, in your work on each of those problems, did
3 you identify certain deficiencies in either Pacific's
4 processes or systems?

5 A. In some cases.

6 Q. So, for example, on the first one dealing with
7 receipt, the implementation of a mechanized tracking
8 system helped to alleviate that problem; is that right?

9 A. To a certain extent, yes.

10 Q. Does it still remain a problem?

11 A. Yes.

12 Q. And is that something that's still being worked
13 on within Pacific, to your knowledge?

14 A. Yes.

15 Q. Do you know what efforts are being undertaken?

16 A. I don't have the specifics around what efforts
17 are going on within the systems community and,

18 essentially, a broad understanding of the efforts that are
19 going on within the staffing within that piece of the
20 business, the LISC itself.

21 Q. But insofar as you are aware, the problems that
22 may remain with the receipt stage dealt with the ability
23 to identify the status of an order, are not processed
24 problems; they are either system problems or staffing
25 problems?

0064

1 A. Correct.

2 Q. And in the response stage, dealing with the
3 timeliness of FOC's, did you identify any deficiencies in
4 Pacific's processes or systems needing work on that
5 problem?

6 A. No.

7 Q. So the lack of a timely FOC was not the result
8 of any deficiency in Pacific's processes or systems in
9 your view?

10 A. No.

11 Q. In your view, what was the cause or what is the
12 cause of lack of timeliness?

13 A. I think it's largely an issue of the increase in
14 volumes in a very short time frame and, again, gets back
15 to the staffing issues.

16 Q. So it's your view that the FOC's could be timely
17 issued if Pacific had adequate staffing devoted to the
18 LISC?

19 MR. KOLTO-WININGER: I will object for lacking
20 foundation. But go ahead and answer.

21 THE WITNESS: Yes, it's a matter of having
22 enough people and sufficient mechanization. I mean,
23 ultimately, what you want to do is mechanize as much of
24 that as you can or eliminate the requirement for it or
25 staff up for it. But again, it becomes a matter of how
0065
1 quickly can you ramp-up staffing, given the quick
2 acceleration in terms of volumes between November and now.

3 MR. McDONALD: Q. Well, in suggesting that
4 increased mechanization would improve the timeliness of
5 issuance of the FOC's, do you mean that -- you mean there
6 could be system enhancements that would improve the FOC
7 intervals?

8 A. I'd be speculating. Greg Torretta would know
9 more about what system enhancement would facilitate that
10 better than I would.

11 Q. But at this point you haven't identified new
12 process enhancements that would facilitate the FOC
13 intervals?

14 A. No.

15 Q. Now, as to the loss of dial tone, you
16 identified, I think -- in your testimony, you already
17 described there were some process problems that caused
18 loss of dial tone; is that right?

19 A. Yes.

20 Q. And you believe that those have been, or at
21 least efforts have been undertaken, to reduce the
22 occurrence of that problem?

23 A. Yes.

24 Q. Are there other deficiencies, besides in the
25 processes that, to your knowledge, that cause loss of dial
0066
1 tone?

2 MR. KOLTO-WININGER: Objection to the
3 characterization of the issue as deficiencies. But go
4 ahead and respond.

5 THE WITNESS: I wouldn't have detailed knowledge
6 of that issue. That would lie more within the
7 provisioning organization's realm, than within the LISC
8 business process.

9 MR. McDONALD: Q. Well, when you are trying to
10 devise a fix, remediation, whatever you want to call it,
11 don't you -- you have not tried to figure out if there are
12 multiple causes, like a third of these things are caused
13 by a system problem, and a third are caused by a process
14 error, and a third are just typist error entry or
15 something, and try to come up with a comprehensive
16 solution?

17 A. Yes.

18 Q. But you are not aware of any -- and in the
19 course of doing that, would you not become aware if there
20 was a system problem?

21 A. Yes.

22 Q. Are you aware of any system problem with the
23 loss of dial tone?

24 A. No.

25 Q. And you have already described, I think, the

0067

1 source of the problem. Is that the extent that you are
2 aware of what caused the loss of dial tone to occur?

3 A. Again, from the business process perspective,
4 yes, I know that it continues to be looked at from the
5 provisioning aspect within that organization.

6 Q. And the loss of features, did you identify any
7 deficiencies in Pacific's processes in looking at that
8 problem?

9 A. No.

10 Q. And you are still looking at the provisioning
11 intervals; is that right?

12 A. Yes.

13 Q. Have you reached any conclusions about any
14 deficiencies in Pacific's processes?

15 A. No.

16 Q. Do you have any time frame for when you expect
17 to reach a conclusion on the provisioning intervals?

18 A. No, we haven't established a time frame as of
19 yet.

20 Q. So there is no CLC's expecting response, there's
21 nothing that you got a fixed deadline by which to provide
22 some kind of a report or something like that?

23 MR. KOLTO-WININGER: Objection. Lacks
24 foundation; calls for speculation. Go ahead.

25 THE WITNESS: No.

0068

1 MR. McDONALD: Q. Completion response, I think
2 you identified changes to both the LTD and to the Cleo, so

3 would you characterize those as system enhancements?

4 A. Yes.

5 Q. To your knowledge, were there any deficiencies
6 in the processes that led to lack of timeliness for
7 completion notices?

8 A. No.

9 Q. So would you attribute the lack of timeliness of
10 the completion notices to a deficiency in the system?

11 A. Yes.

12 Q. And presumably, these changes that you already
13 testified about will make the improvements that will
14 reduce or eliminate that problem?

15 A. That's my assumption.

16 MR. McDONALD: Okay. This might be an
17 appropriate place to take a break.

18

19 (Whereupon, the proceedings were
20 adjourned for lunch at 12:00 p.m.)

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0069

1 AFTERNOON SESSION 1:05 P.M.

2

3 EXAMINATION BY MR. McDONALD (RESUMED)

4 MR. McDONALD: Q. Now, we talked about the five
5 stages of the resale order process in your testimony this